UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK STEVE BIEGEL, Plaintiff, -against 07 Civ. 9653 (CM) (THK) DENTSU HOLDINGS USA, INC., DENTSU AMERICA, INC., TOYO SHIGETA and TIMOTHY ANDREE, Defendants. Defendants.

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Amber L. Kagan, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Mark S. Dichter Morgan, Lewis & Bockius 1701 Market Street Philadelphia, PA 19103 (215) 963-5000 (215) 963-5001

Mark S. Dichter is a member in good standing of the Bar of the State of Pennsylvania and there are no pending disciplinary proceedings against Mark S. Dichter in any state or federal courts.

Dated: New York, New York

January 10, 2008

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By:

Amber L. Kagan (AK-7973)

101 Park Avenue

New York, New York 10178-0060

(212) 309-6000

Attorneys for Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEVE BIEGEL,

Plaintiff,

-against-

07 Civ. 9653 (CM) (THK)

DENTSU HOLDINGS USA, INC., DENTSU AMERICA, INC., TOYO SHIGETA and TIMOTHY ANDREE.

Defendants.

AFFIDAVIT OF AMBER KAGAN IN SUPPORT OF MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

STATE OF NEW YORK) ss.: COUNTY OF NEW YORK)

AMBER L. KAGAN, being duly sworn, deposes and says the following:

- 1. I am a member of the Bar of this Court and am a partner with the law firm of Morgan Lewis & Bockius, LLP, 101 Park Avenue, New York, New York 10178, counsel for defendants Dentsu Holdings USA, Inc., Dentsu America, Inc., Toyo Shigeta and Timothy Andree (collectively "Defendants").
- I make this declaration in support of Defendants' Motion pursuant to 2. Local Rule 1.3(c) of the United States District Court, Southern District of New York, for an Order admitting Mark S. Dichter to practice before this Court as counsel for the Defendants for all purposes in this action.
 - 3. Mr. Dichter is a partner of the law firm of Morgan, Lewis & Bockius LLP,



Attached as Exhibit A to the accompanying Affidavit of Mark S. Dichter is a Certificate of Good Standing issued by that jurisdiction.

4. It is the desire of the Defendants to have Mr. Dichter represent them for all purposes in this action.

WHEREFORE, it is respectfully requested that Mark S. Dichter be admitted to practice before this Court as counsel for the Defendants for all purposes in this action.

Pursuant to 28 U.S.C. § 1746, I declare on penalty of perjury that the foregoing is true and correct.

Dated: New York, New York January 10, 2008

Amber L. Kagan

Subscribed and sworn to before me this 10 day of January, 2008

Notary Public

EVELYN PERRY
Notary Public, State of New York
No. 01753353275
Oualified in Suifolk County
Commission Expires Dec. 11, 202

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YOR	k x	
STEVE BIEGEL,	:	
Plaintiff,	:	
-against-	: :	
	:	07 Civ. 9653 (CM) (THK)
DENTSU HOLDINGS USA, INC., DENTSU AMERICA, INC., TOYO SHIGETA and TIMOTHY ANDREE,	: : :	
Defendants.	: : :	
	X	

AFFIDAVIT OF MARK S. DICHTER IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

COMMONWEALTH OF PENNSYLVANIA)	
)	ss.:
COUNTY OF PHILADELPHIA)	

MARK S. DICHTER, being duly sworn, deposes and says the following:

I am a partner of the law firm of Morgan, Lewis & Bockius LLP, 1701 Market Street, Philadelphia, PA 19103, where I maintain an office for the practice of law.

- 1. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned action.
- 2. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the Commonwealth of Pennsylvania.
- 3. There are no pending disciplinary proceedings against me in any State or Federal court.

Mark S. Dichter

Subscribed and sworn to before me this 8th day of January, 2008

.

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Annette Lopresti, Notary Public City Of Philadelphia, Philadelphia County My Commission Expires June 24, 2010

Member, Pennsylvania Association of Notaries



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Mark S. Dichter, Esq.

DATE OF ADMISSION

November 5, 1969

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: December 21, 2007

Chief Clerk

	•
STEVE BIEGEL,	· :
Plaintiff,	:
-against-	:
Ç	: 07 Civ. 9653 (CM) (THK)
DENTSU HOLDINGS USA, INC.,	: :
DENTSU AMERICA, INC., TOYO	:
SHIGETA and TIMOTHY ANDREE,	:
Defendants.	: :
	· :
Defendants.	: : : x

ORDER TO ADMIT MARK S. DICHTER PRO HAC VICE

The motion for admission to practice pro hac vice in the above-captioned matter is granted. The admitted attorney, MARK S. DICHTER, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice pro hac vice is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Dated:	

Pro Hac Vice Attorney cc:



CERTIFICATE OF SERVICE

I certify that on this 10th day of January, 2008, I caused a true and correct copy of the foregoing Motion for Admission Pro Hac Vice, Affidavits of Amber Kagan and Mark S. Dichter, and Order To Admit to be served federal express upon:

> Andrew Dwyer The Dwyer Law Firm, L.L.C. 17 Academy Street, Suite 1010 Newark, New Jersey 07102

Attorneys for the Plaintiff

Maronya C. Scharf (MS – 8791)

Dated: New York, New York January 10, 2008